

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Before Commissioners:

Robert G. Taub, Chairman;  
Mark Acton, Vice Chairman;  
Tony Hammond; and  
Nanci E. Langley

Periodic Reporting  
(Proposal Three)

Docket No. RM2017-7

NOTICE OF PROPOSED RULEMAKING ON  
ANALYTICAL PRINCIPLES USED IN PERIODIC REPORTING  
(PROPOSAL THREE)

(Issued June 27, 2017)

I. INTRODUCTION

On June 22, 2017, the Postal Service filed a petition pursuant to 39 CFR 3050.11 requesting the Commission to initiate an informal rulemaking proceeding to consider proposed changes to an analytical method related to periodic reports.<sup>1</sup> The Petition identifies the proposed analytical method changes filed in this docket as Proposal Three.

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<sup>1</sup> Petition of the United States Postal Service Requesting Initiation of a Proceeding to Consider a Proposed Change in Analytical Principles (Proposal Three), June 22, 2017 (Petition).

## II. PROPOSAL THREE

*Background.* The Postal Service currently uses statistical estimates in the Revenue, Pieces, and Weight (RPW) Report for mailpieces reported in the Retail Systems Software Business Partners (RSS BP) application and bearing contract postal unit metered postage. Petition at 1. The RSS BP is the electronic point-of-sale management system that the Postal Service provides to contract postal units. *Id.* at 4. The statistical estimates used in the RSS BP management system are produced by the Postal Service's Origin-Destination Information System – Revenue, Pieces, and Weight (ODIS-RPW) probability-based sampling system. *Id.* at 4, 5.

*Proposal.* Proposal Three would change the methodology for measuring the national totals of revenue, pieces, and weight in the RPW Report for RSS BP mailpieces by replacing ODIS-RPW statistical sampling estimates with corresponding census data reported in the Postal Service's Retail Data Mart reporting system. *Id.* at 6. In support of Proposal Three, the Postal Service cites other proposals approved by the Commission which have replaced statistical estimates with census data. *See id.* at 3.

*Rationale and impact.* The Postal Service states that the proposed change in methodology "provides a complete census source of transactional-level data of all RSS BP mailpieces and extra services." *Id.* at 6. The Postal Service asserts that the use of census data would lead one to expect equal or improved data quality because census data, unlike ODIS-RPW statistical sampling data, does not have sampling error. *Id.* at 5. To illustrate the potential impact of switching from ODIS-RPW statistical estimates to census data, the Postal Service provides a comparison of results for the FY 2016 time period. *Id.* at 6-9.

## III. NOTICE AND COMMENT

The Commission establishes Docket No. RM2017-7 for consideration of matters raised by the Petition. More information on the Petition may be accessed via the Commission's website at <http://www.prc.gov>. Interested persons may submit comments on the Petition and Proposal Three no later than August 16, 2017. Pursuant to 39

U.S.C. 505, Lyudmila Y. Bzhilyanskaya is designated as officer of the Commission (Public Representative) to represent the interests of the general public in this proceeding.

#### IV. ORDERING PARAGRAPHS

*It is ordered:*

1. The Commission establishes Docket No. RM2017-7 for consideration of the matters raised by the Petition of the United States Postal Service Requesting Initiation of a Proceeding to Consider a Proposed Change in Analytical Principles (Proposal Three), filed June 22, 2017.
2. Comments by interested persons in this proceeding are due no later than August 16, 2017.
3. Pursuant to 39 U.S.C. 505, the Commission appoints Lyudmila Y. Bzhilyanskaya to serve as an officer of the Commission (Public Representative) to represent the interests of the general public in this docket.
4. The Secretary shall arrange for publication of this Order in the *Federal Register*.

By the Commission.

Stacy L. Ruble  
Secretary